



State of New Jersey

DONALD T. DiFRANCESCO
Acting Governor

Department of Environmental Protection
Division of Environmental Safety, Health and Analytical Programs
Radiation Protection Programs
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Robert C. Shinn, Jr.
Commissioner

October 3, 2001

Mr. Paul Lohaus, Director
Office of State and Tribal Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Lohaus:

Enclosed please find a letter dated September 14, 2001 in which the NJ Bureau of Nuclear Engineering raised comments and concerns regarding a change in the technical specifications for Hope Creek Generating Station which would have eliminated the MSIV Seal System.

Our staff has been informed by Rick Ennis, the NRC's licensing Project Manager for Hope Creek that the NRC has addressed our comments. The resolution of the comments is discussed in the supporting information for the license amendment that is expected to be issued on Friday, October 5, 2001. No changes to the License Change Request were required on the part of PSEG.

We respectfully request that we have an opportunity to view the supporting information and if our concerns are not addressed by that information, have a chance to present our concerns more clearly. At the very least, we would appreciate a discussion about our concerns before NRC issues the approval for the license change.

If Hope Creek is allowed to make this change, they will be creating an unmonitored,

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unfiltered release pathway. We question the wisdom of NRC allowing elimination of design features that were intended to limit the release of fission products following an accident.

After the NRC has approved the License Change, we are not aware of any opportunity for an appeal. We are requesting that you facilitate some discussion on this issue before Friday.

Thank you for your consideration of this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Lipoti", written in a cursive style.

Jill Lipoti, Ph.D.,
Assistant Director

Distribution

Kent Tosch, DEP

Dennis Zannoni, DEP

Dr. Robert Bores, NRC, Region 1

Richard Ennis, NRC Licensing Project Manager

Joe Shoppy, Sr. Resident Inspector

Gabe Salamon, PSEG



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Robert C. Shinn, Jr.
Commissioner

DONALD T. DiFRANCESCO
Acting Governor

September 14, 2001

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Hope Creek Generating Station
Docket No. 50-354
License Change Request H01-02
Request to Eliminate the MSIV Seal System

PSEG requested a revision to the Technical Specifications for Hope Creek by letter to the NRC dated May 17, 2001. The proposed change will allow PSEG to eliminate the Main Steam Isolation Valve (MSIV) Sealing System and to increase the allowable leakage through the MSIVs.

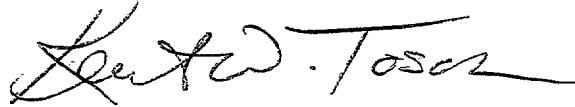
If implemented the resulting change will create an unmonitored, unfiltered containment leakage pathway. By utilizing the alternate source term, recently approved by the NRC for use on a case by case basis, PSEG is able to show that the post accident release through this pathway and other pathways are within NRC limits.

We are concerned that an unmonitored, unfiltered release pathway is being created by this change. We recognize that the resulting analysis show the post accident dose is within limits, however, we question the wisdom of NRC allowing elimination of design features that were intended to limit the release of fission products following an accident, while at the same time, encouraging states to consider implementing distribution of potassium iodide as a supplemental protective action from the release of fission products.

In addition, enhancements to radiation monitoring systems have not been addressed. Finally, models used to calculate projected dose for decision making during emergency preparedness have not been altered to incorporate this unmonitored unfiltered ground level release pathway.

Your prompt response is requested. If you need to discuss the subject further, please contact Rich Pinney at (609) 984-7558.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent W. Tosch". The signature is fluid and cursive, with the first name "Kent" being more prominent.

Kent W. Tosch, Manager
Bureau of Nuclear Engineering

Distribution

Dr. Jill Lipoti, DEP
Dennis Zannoni, DEP
Dr. Robert Bores, NRC
Richard Ennis, NRC Licensing Project Manager
Joe Shoppy, Sr Resident Inspector
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